

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

EDUARDO JACOBS,

Plaintiff,

Case No.:2:15-CV-10516

HON. Denise Page Hood

v.

Mag. Judge Stephanie Dawkins Davis

WAYNE COUNTY SHERIFF
DEPUTY RAYMON ALAM,
DETROIT POLICE OFFICER
DAMON KIMBROUGH, DETROIT
POLICE OFFICER MICHAEL
KNOX, and WAYNE COUNTY
SHERIFF DEPUTY DAVE
WEINMAN, in their individual
capacities, jointly and severally,

Defendants.

SECOND AMENDED EXPERT WITNESS LIST BY
PLAINTIFF EDUARDO JACOBS

NOW COMES Plaintiff, Eduardo Jacobs, by and through his attorneys, HAMMOUD DAKHLALLAH & ASSOCIATES, PLLC, and hereby identifies the following expert witnesses who may be called to provide expert opinions in this case, and/or to provide rebuttal testimony to Defendants' expert witness(es):

1. Nitin V. Paranjpe, Ph.D., Thomson Econometrics & Employment Research,

2350 Franklin Rd., Ste., 200, Bloomfield Hills, Michigan 48302. Phone: (248) 292-0208. Forensic Economist/Damages Expert. Will testify as to the damages flowing from Defendants' wrongful actions, and as to the damages incurred as a result of Defendants' wrongful actions.

2. Andrew Nay, Ph.D., C.D.M.S., C.R.C., Hostetler-Fontaine & Associates, 26211 Central Park Blvd., Ste., 501, Southfield, Michigan 48076. Phone: (248) 354-3540. Vocational Rehabilitation/Damages Expert. Will testify as Plaintiff's ability to obtain gainful employment, Plaintiff's earning capacity, lost earnings capacity, and to the damages from Defendants' wrongful actions, and as to the damages incurred as a result of Defendants' wrongful actions.
3. Guy A. Hostetler, MA, CDMS, ABVE, ABDA, DABFC, LPC, Hostetler-Fontaine & Associates, 26211 Central Park Blvd., Ste., 501, Southfield, Michigan 48076. Phone: (248) 354-3540. Vocational Rehabilitation/Damage Expert. Will testify as Plaintiff's ability to obtain gainful employment, Plaintiff's earning capacity, lost earnings capacity, and to the damages from Defendants' wrongful actions, and as to the damages incurred as a result of Defendants' wrongful actions.
4. Brandon Giroux, Giroux Forensic Inc., Phone: (248) 762-5731. Firearms Expert. Will testify as to the operation and functionality of Plaintiff's handgun.

5. William Cousins, William J. Cousins & Associates, P.O. Box 770, Lake Orion, Michigan, 48361. Phone (248) 783-7190. Use of Force Expert. Will testify as to the Defendants' reasonableness for use of force.
6. Rebuttal experts as necessary.

Respectfully submitted,

HAMMOUD DAKHLALLAH &
ASSOCIATES, PLLC

/s/ Kassem M. Dakhallallah

Kassem M. Dakhallallah (P70842)

Attorney for Plaintiff

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Dated: April 24, 2019

CERTIFICATE OF SERVICE

I certify that on April 24, 2019, I served a copy of the foregoing upon all counsel of record via the Court's ECF electronic filing system which will send electronic notification of this filing to all parties, and declare that this statement is true to the best of my information, knowledge, and belief.

/s/Mohamed A. Nehme

Mohamed A. Nehme

Attorney